

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
(Eastern Division)

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COMMONWEALTH CARE  
ALLIANCE, HEALTH CARE FOR  
ALL, GLENN CRENSHAW, AND  
PAULA CRENSHAW, individually  
and on behalf of persons similarly  
situated,

Plaintiffs

v.

ASTRAZENECA  
PHARMACEUTICALS L.P.,  
ASTRAZENECA PLC,  
ASTRAZENECA US, ZENECA, INC.,  
AND ZENECA HOLDINGS, INC.,

Defendants.

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No. 05 CV 10-335-DPW

**DEFENDANTS' CERTIFICATION**  
**PURSUANT TO LOCAL RULE 16.1(D)(3)**

Pursuant to Local Rule of Civil Procedure 16.1(d)(3), Defendants AstraZeneca Pharmaceuticals LP, Zeneca, Inc., and Zeneca Holdings, Inc. ("Defendants") (AstraZeneca US is not a legal or operating entity and, therefore, is not able to make a certification pursuant to Local Rule 16.1)<sup>1</sup> and Defendants' counsel hereby certify that they have conferred (1) with a view towards establishing a budget for the costs of conducting the full course - and various

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<sup>1</sup> Defendant AstraZeneca PLC intends to file a motion to dismiss that corporation from this action on the grounds that personal jurisdiction over AstraZeneca PLC is lacking. AstraZeneca, PLC is a corporation formed under the laws of the United Kingdom and has no operations in the Commonwealth of Massachusetts.

alternative courses - of the litigation; and (2) to consider the resolution of the litigation through the use of alternative resolution programs, such as those outlined in LR 16.4.

/s/ Peter L. Welsh

Harvey J. Wolkoff (BBO #532880)

Joshua S. Levy (BBO #563017)

Peter L. Welsh (BBO #643261)

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Holdings, Inc.*

*Authorized Representative for AstraZeneca Pharmaceuticals LP,  
Zeneca, Inc., and Zeneca Holdings, Inc.*

Marie L. Martino

Marie L. Martino

Certificate of Service

The undersigned hereby certifies that a copy of the foregoing was served electronically pursuant to Fed. R. Civ. P. 5(b)(2)(D) or mailed pursuant to Fed. R. Civ. P. 5(b)(2)(B), by First Class Mail, postage prepaid, this 31st of March, 2005, to the counsel of record for each party.

/s/ Peter L. Welsh

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Dated: March 31, 2005